UNITED STATES COURT OF APPEALS

FOR THE DISTRICT OF COLUMBIA CIRCUIT

AMPERSAND PUBLISHING, LLC d/b/a Santa Barbara News-Press,

Petitioner,

Graphics Communications Conference of the International Brotherhood of Teamsters,

Intervenor,

National Labor Relations Board,

Respondent.

CASE NO. 15-1074 362 NLRB No. 26 (2015) 31-CA-28589 et al

Filed: 04/20/2015

Graphics Communications
Conference of the International
Brotherhood of Teamsters Motion for
Leave to Intervene

GCC/IBT'S MOTION FOR LEAVE TO INTERVENE

Comes now, Graphics Communications Conference of the International Brotherhood of Teamsters ("GCC/IBT" or "Union"), and pursuant to Rule 15 of the Federal Rules of Appellate Procedure, seeks leave to intervene in this matter. Said motion to intervene is made on the following grounds:

1. The Union is the Charging Party in the administrative proceeding below with respect to all of the unfair labor practice charges encompassing the case decided by the NLRB.

522268.1 11621-18008

Filed: 04/20/2015

- 2. The Union, through undersigned counsel, who is admitted to the Bar of this Court, actively participated in the administrative proceeding culminating in the Board's decision now presented to this Court for enforcement.
 - 3. Undersigned counsel is familiar with the record in this matter.
- 4. Respectfully, the Union believes that the appellate process in this matter will benefit from its participation.

DATED: April 20, 2015 Respectfully submitted,

BUSH GOTTLIEB A Law Corporation

By: /s/IRA L. GOTTLIEB

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2015, copies of the foregoing GCC/IBT's Motion to Intervene were served on the following counsel of record through the CM/ECF system if they are registered users, or, if they are not, by serving a true and correct copy at the addresses listed below:

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